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20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 GABRIELLE GANGITANO,

Case No. 5:17-cv-02870-LHK

23 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE MEDIATION DEADLINE**

24 v.

25 CABRILLO COLLEGE, and ALEX B.
TAURKE,

26 Defendants.

27 **Hon. Lucy H. Koh**

STIPULATION

Plaintiff GABRIELLE GANGITANO and Defendants CABRILLO COLLEGE and ALEX B. TAURKE by and through counsel of record for the DISTRICT, hereby represent to the Court as follows:

1. By Order dated August 23, 2017, the parties were ordered to complete private mediation by November 30, 2017.

2. The parties respectfully request that the deadline to complete mediation be extended to December 8, 2017 and to file their joint case management statement (or a notice of settlement) by December 11, 2017 for the December 13, 2017 case management conference.

3. The parties have been diligently conducting discovery. The depositions of defendant Alex Taurke and Cabrillo College occurred respectively on October 9, 2017 and October 12, 2017. Written discovery is proceedings. Plaintiff, a college student, is scheduled to be deposed on November 10, 2017.

4. The parties have agreed to attend private mediation with John Bates, Jr., Esq. on December 8, 2017.

5. For all the good cause stated above, the parties respectfully request this Court continue the deadline to complete private mediation from November 30, 2017 to December 8, 2018 and to file their joint case management statement (or a notice of settlement) by December 11, 2017 for the December 13, 2017 case management conference

6. The parties respectfully request that the Court approve this stipulation and incorporate its terms in an Order.

It is so stipulated and agreed.

Dated: October 23, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Nicole Phillips
Eugene B. Elliot
Ethan M. Lowry
Nicole L. Phillips
Attorneys for Defendant
CABRILLO COMMUNITY COLLEGE DISTRICT

1 Dated: October 23, 2017

DAVIS & YOUNG, APLC

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3 By: /s/ Mark Davis
4 Mark E. Davis
5 Adam J. Davis
6 Attorneys for Defendant
7 ALEX TAURKE

8 Dated: October 23, 2017

9 KRISTENSEN WEISBERG, LLP

10 By: /s/ John Kristensen
11 John P. Kristensen
12 David L. Weisberg
13 Christina M. Le
14 Attorneys for Plaintiff
15 GABRIELLE GANGITANO

ATTORNEY ATTESTATION

16 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
17 conformed signature (“/s/”) within this E-filed document or have been authorized by plaintiff’s counsel
18 to show their signature on this document as /s/.

19 Dated: October 23, 2017

20 By: /s/ Nicole Phillips
21 Nicole L. Phillips

[PROPOSED] ORDER

22 GOOD CAUSE APPEARING THEREFORE, and the parties’ having stipulated to the same, the
23 parties’ stipulation is hereby APPROVED. The deadline to complete mediation currently set for
24 November 30, 2017 is continued to December 8, 2017 and the deadline to file a joint case management
25 statement is continued to December 11, 2017

IT IS SO ORDERED.

26 Dated: _____

27 Lucy H. Koh
28 UNITED STATES DISTRICT COURT JUDGE